

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Becky Berscheid,

Plaintiff,

vs.

Midland Credit Management, Inc., and
Experian Information Solutions, Inc.,

Defendants.

Case No. 0:22-cv-00086-JRT-LIB

**PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES AND COSTS
AGAINST DEFENDANT
MIDLAND CREDIT
MANAGEMENT, INC.**

COMES NOW Plaintiff, by and through counsel, with Plaintiff’s Motion for Attorneys’ Fees and Costs against Defendant Midland Credit Management, Inc (the “Motion”). In support of the Motion, Plaintiff states as follows:

1. Plaintiff timely accepted Midland Credit Management, Inc.’s (“Midland”) Rule 68 Offer of Judgment (“OOJ”). *See* [Dkt. 44].
2. The OOJ provided judgment in favor of Plaintiff against Midland in the amount of \$10,001.00, plus costs and attorneys’ fees. *See* [Dkt. 44].
3. Midland filed the OOJ and acceptance on October 28, 2022. *See* [Dkt. 44].
4. Judgment was entered on November 1, 2022 on the terms provided in the OOJ.
5. The only remaining issue against Midland is for the Court to determine the amount to award Plaintiff in attorneys’ fees and costs.

6. Plaintiff's motion is supported by a Memorandum in Support, a Declaration of Ryan Peterson, and a Declaration of Anthony Chester, along with all exhibits and sub-exhibits attached to the declarations.

WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff's Motion for Attorneys' Fees and Costs against Defendant Midland Credit Management, Inc., award Plaintiff attorneys' fees in the amount of \$45,068.58, award Plaintiff costs in the amount of \$32.50, and grant Plaintiff all other just and proper relief.

Dated: November 15, 2022

Respectfully Submitted,

KAZEROUNI LAW GROUP, APC

/s/ Anthony P. Chester

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